IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS BEAUMONT DIVISION

UNITED STATES OF AMERICA	§
v.	§ CRIMINAL NO. 1:20-CR-64 § Crone-Giblin
JUAN DELOERA, a/k/a "Juanito", (1)	§
SALVADOR ARMAS-LOPEZ, (2)	§
FERNANDO PEREZ-GOMEZ, (3)	FILED U.S. DISTRICT COURT
JOSE SILVA REYES, (4)	U.S. DISTRICT COURT EASTERN DISTRICT OF TEXAS
ALBERTO ZENEDJA GOMEZ (5)	8
EDDY MONTILLA, (6)	§ JUL - 1 2020
WILKINS RODRIGUEZ, (7)	§ JOL - 1 2020
BYRON EUGENE BINGHAM, a/k/a	§
"Geno", (8)	§ BY
CLIFFORD SINGLETON, (9)	§ DEPUTY
REGINALD LURON GROSS, (10)	§
ROBERTO ROBLES, (11)	\\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\
TYRON ROWELL, a/k/a "Tyrone", (12)	§
RAYMOND RODRIGUEZ, (13)	§
LUIS DIAZ-MARTINEZ, a/k/a	§
"Socrates Salcedo-Angulo", (14)	§
PAULA NOELIA RIOS, (15) and	§
LEONEL CERVANTEZ-RUIZ, a/k/a	§
"Jorge Alvarado-Castro", (16)	§

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846
Conspiracy to possess with intent to distribute a controlled substance (heroin, methamphetamine actual and cocaine HCL)

That from on or about May 15, 2015, the exact date being unknown to the Grand Jury, and continuing thereafter until on or about October 9, 2017 in the Eastern District of Texas and elsewhere,

Juan Deloera, a/k/a "Juanito", (1)

Salvador Armas-Lopez, (2)

Fernando Perez-Gomez, (3)

Jose Silva Reyes, (4)

Alberto Zenedja Gomez, (5)

Eddy Montilla, (6)

Wilkins Rodriguez, (7)

Byron Eugene Bingham, a/k/a "Geno", (8)

Clifford Singleton, (9)

Reginald Luron Gross, (10)

Roberto Robles, (11)

Tyron Rowell, a/k/a "Tyrone", (12)

Raymond Rodriguez, (13)

Luis Diaz-Martinez, a/k/a "Socrates Salcedo-Angulo", (14)

Paula Noelia Rios, (15) and

Leonel Cervantez-Ruiz, a/k/a "Jorge Alvarado-Castro", (16)

defendants, did intentionally and knowingly conspire, combine, confederate and agree together, with each other, and with other persons known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance, to wit; a Schedule I controlled substance, namely, one (1) kilogram or more of heroin, a Schedule II controlled substance, namely, 50 grams or more of methamphetamine

"actual", and a Schedule II controlled substance, namely, five (5) kilograms or more of cocaine HCL.

In violation of 21 U.S.C. § 841(a)(1), all in violation of 21 U.S.C. § 846 and 18 U.S.C. § 2.

Count Two

Violation: 18 U.S.C. § 1956(h) Conspiracy to commit money laundering

That from about March 12, 2015, the exact date being unknown to the Grand Jury, and continuing thereafter until on or about September 30, 2016, in the Eastern District of Texas and elsewhere, Juan Deloera, a/k/a "Juanito", (1), Salvador Armas-Lopez, (2), Fernando Perez-Gomez, (3), Jose Silva Reyes, (4), and Leonel Cervantez-Ruiz, a/k/a "Jorge Alvarado-Castro", (16), defendants, did intentionally and knowingly conspire, combine, confederate and agree with others, known and unknown to the Grand Jury to commit offenses against the United States in violation of 18 U.S.C. §§ 1956, to wit: to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, distribution, or conspiracy to distribute or possess with intent to distribute, a controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 846, with the intent to promote the carrying on of specified unlawful activity, that is, distribution, or conspiracy to distribute or possess with intent to distribute, a controlled substance in violation of 21 U.S.C. §§ 841(a)(1) and 846, and that while conducting and attempting to conduct such financial

transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);

All in violation of 18 U.S.C. §§ 1956(h) and 2.

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE Criminal Forfeiture Pursuant to 21 U.S.C.\$ 853 and \$ 881

Upon conviction of the controlled substance offense alleged in Count One of this indictment, defendants herein, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained directly, or indirectly, as a result of the said violation, and any property used, or intended to be used in any manner or part, to commit or to facilitate the commission of the said violation, including but not limited to the following:

MONEY JUDGMENT

A sum of money equal to four million, nine hundred and ninety-seven thousand, nine hundred and eighteen dollars (\$4,997,918.00) in United States currency, representing the amount of proceeds obtained as a result of the offense alleged in Count One, conspiracy to distribute and possess with intent to distribute a Schedule I controlled substance, namely one (1) kilogram of heroin, a Schedule II controlled substance, namely 50 grams or more of "actual" methamphetamine and a Schedule II controlled substance, namely five (5) kilograms or more of cocaine HCL, for which the defendants are personally liable for the approximate amounts shown below:

Juan Deloera, a/k/a "Juanito", (1)	\$586,730.00
Salvador Armas-Lopez, (2)	\$334,361.00
Fernando Perez-Gomez, (3)	\$79,453.00
Jose Silva Reyes, (4)	\$1,452,702.00
Alberto Zenedja Gomez, (5)	\$1,340,402.00
Eddy Montilla, (6)	\$47,655.00
Wilkins Rodriguez, (7)	\$47,655.00
Byron Eugene Bingham, a/k/a "Geno", (8)	\$50,312.00
Clifford Singleton, (9)	\$50,312.00
Reginald Luron Gross, (10)	\$50,312.00
Roberto Robles, (11)	\$301,597.00
Tyron Rowell, a/k/a "Tyrone", (12)	\$16,416.00
Raymond Rodriguez, (13)	\$31,798.00
Luis Diaz-Martinez, a/k/a "Socrates Salcedo-Angulo", (14)	\$292,500.00
Paula Noelia Rios, (15) and	\$292,500.00
Leonel Cervantez-Ruiz, a/k/a "Jorge Alvarado-Castro", (16)	\$23,213.00

A TRUE BILL

GRAND JURY FOREPERSON

STEPHEN J. COX UNITED STATES ATTORNEY

Michelle S. Englade

Assistant United States Attorney

 $\frac{7/1}{\text{Date}} / 2020$

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UNITED STATES OF AMERICA §	
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LUIS DIAZ-MARTINEZ, a/k/a \$ "Socrates Salcedo-Angulo", (14) \$ PAULA NOELIA RIOS, (15) and \$ LEONEL CERVANTEZ-RUIZ, a/k/a "Jorge Alvarado-Castro", (16) \$	

NOTICE OF PENALTY

Count One

<u>Violation</u>: 21 U.S.C. §§ 846 and 841(a)(1)

Penalty: One (1) kilogram or more of heroin, 50 grams or more of

methamphetamine "actual" or five (5) kilograms or more of cocaine

HCL)

Imprisonment for not less than ten (10) years nor more than life, a fine not to exceed \$10,000,000.00, or both, and a term of supervised release of not less than five (5) years.

Special Assessment: \$100.00

Count Two

<u>Violation</u>: 18 U.S.C. § 1956(h)

Penalty: Imprisonment for not more than twenty (20) years, a fine not to exceed

\$500,000.00, or twice the value of the property involved in the transaction, whichever is greater, or both, and a term of supervised

release of at least than three (3) years.

Special Assessment: \$100.00